

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF
ILLINOIS EASTERN DIVISION**

RONALD C. TATUM.

Plaintiff,

V.

10 ROADS EXPRESS, LLC, 10 ROADS SOUTH, LLC, GINO PRESTIA, and JEFF NATELBORG,

Defendants.

Case No. 21-cv-06732

Judge Sharon Johnson Coleman

Magistrate Judge Beth Jantz

JURY DEMANDED

SCHEDULE 5(b): DEFENDANTS' EXHIBIT LIST

10 Roads Express, LLC and 10 Roads South, LLC (collectively “10 Roads Express”), by their attorney, Joseph K. Nichele of Momkus LLP, discloses the following Exhibits that may be used to question witnesses on and/or seek to introduce into evidence at the trial in this matter, as well as his demonstrative exhibits.

Exhibit No.	Date	Description	Objection	Response
DX 1	XXX	10 Roads Employee Handbook (D. 351-385)	XXX	XXX
DX 2	08/26/20	Acknowledgment of Receipt of Employee Handbook (D. 30-32)	XXX	XXX
DX 3	11/02/20	Statement from Jeff Natelborg (D. 18)	XXX	XXX
DX 4	11/02/20	Statement from Gino Prestia (D. 17)	XXX	XXX
DX 5	11/03/20	Statement from Richard Patterson (D. 19)	XXX	XXX
DX 5	10/24/20	Text Message from Ronald Tatum to Jeff Natelborg (P. 08).	XXX	XXX

DX 6	10/26/20	Correspondence from Caitlin Ellis to Ronald Tatum (D. 21-22)	XXX	XXX
DX 7	10/27/20	Emails between Jeff Nateborg and Catlin Ellis (D. 812-814)	XXX	XXX
DX 8	10/27/20	Separation Notice (D. 20)	XXX	XXX
DX 9	10/03/2022	IWCC Application for Adjustment of Claim (P. 76-77)	FRE 401, 403 (see P's MIL)	Relevant to Defendant's intention or motivation in accepting Plaintiff's retaliation
DX 10	4/8/2025	22WC025989 Motion to Voluntarily Dismiss	FRE 401, 403 (see P's MIL)	See response to objection to DX 9
DX 11	4/12/04	Settlement Documents 00WC18519 (P. 74-75)	FRE 401, 403 (see P's MIL)	See response to objection to DX 9
DX 12	XXX	Ronald Tatum Resume (P. 525-528)	XXX	XXX
DX 13	XXX	Ronald Tatum's Job Search Documents (P. 311-459, 488-523, 649-688)	XXX	XXX

The above list of exhibits is subject to modification based on any stipulations the parties can reach and the Court's rulings on the parties' respective Motions *in Limine*. 10 Roads Express reserves the right to use any Exhibit identified by the Plaintiff. 10 Roads Express reserves the right to use and/or seek to admit into evidence other documents not identified above to refresh recollection pursuant to FRE 612 and/or in rebuttal to Plaintiff's case in chief. 10 Roads Express also reserves the right to propose additional demonstrative evidence and to use any demonstrative evidence Plaintiff identifies and/or brings to trial.

Respectfully submitted,

10 ROADS EXPRESS, LLC, and
10 ROADS SOUTH, LLC,

By: /s/ Joseph K. Nichele

One of their Attorneys

Joseph K. Nichele (jnichele@momkus.com)

Momkus LLP

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